REMARKS

Applicant respectfully requests reconsideration and allowance of all pending claims in view of the above-amendments and the following remarks.

I. CLAIM AMENDMENTS

Independent claims 1, 13 and 14 are amended to clarify that the direct communication tunnel allows the client terminal and the mobile server terminal to communicate in a point-to-point mode.

Support for this amendment can be found in the specification on page 7, lines 13-14; page 9, lines 18-26; and page 11, lines 3-5, for example. (See, Substitute Specification - Clean Version, filed December 14, 2007).

II. CLAIM REJECTIONS UNDER 35 USC § 102

Claims 1-2, 10, and 13-14 are rejected under 35 U.S.C. 102(e) as being allegedly anticipated by Liu et al. (US 2004/0120295).

A. Liu Does Not Disclose a "Direct Communication Tunnel Between the Client Terminal and the Mobile Server Terminal"

The Liu reference does not anticipate Applicant's claims 1-2, 10 or 13-14, either as examined or as amended above. Regarding the "direct communication tunnel", the Examiner refers to Liu, Fig. 1D, 2A and 2B, the "Proxy Server.pdf" and the "IPsec.pdf".

Liu discloses tunneling only between the HA module and the MN/FA modules, which act as intermediaries for communication between the mobile node MN and the corresponding node CN. Liu does not disclose a direct communication tunnel between the mobile node MN and the corresponding node CN and provides no reason to make such a modification.

In fact, looking at the communication diagrams shown in FIGS. 2A-2D, Lui provides no direct tunnel between the MN and CN nodes that could be compared to the direct communication

tunnel shown at the bottom of the present Applicant's FIG. 3 between mobile terminal 304 and client terminal 300, for example.

Similarly, Liu's FIGS. 4A and 4B disclose only discrete tunnels: "ISPEC Tunnel between HA and VPN"; Mobile IP Tunnel between HA and MIP Proxy"; "IPsec Tunnel between VPN and Mobile Node; etc. Clearly, looking at FIGS. 4A and 4B, Liu does not disclose or intend for a direct communication tunnel to be established between the corresponding node CN and the mobile node MN.

Since the Liu reference mentions an "IPsec Tunnel", the Examiner cited the "IPsec.pdf" reference to "give detail about tunneling". However, at most, the IPsec.pdf gives details about one of the discrete tunnels between two intermediate devices used by Liu. It provides no basis for the Examiner to conclude that Liu discloses or inherently includes a direct communication tunnel between the corresponding node CN and mobile node MN.

The Examiner's reliance on the IPsec.pdf reference therefore does not lead a person of ordinary skill in the art to the invention recited in Applicant's claim 1 or provide that person with any obvious reason to modify Liu to contain such a tunnel, such the Examiner consider a rejection under §103.

B. **Liu Does Not Disclose Such a Tunnel that Allows Communication Between the Client Terminal and the Mobile Server Terminal in a "Point-to-Point Mode"**

The independent claims are amended to further define that the direct communication tunnel allows the client terminal and the mobile server terminal to communicate in "a point-to-point mode."

Liu does not disclose a point-to-point communication mode between a client terminal and a mobile server terminal, and particularly within the context of claims 1, 13 and 14.

C. **Liu Does Not Disclose The Claimed Access Request**

Claim 1 requires the mobile server terminal to include:

means for receiving an access request from the client terminal, wherein the access request signal belongs to the group including an SMS message and an email message; and

means for establishing a communication session by opening a direct communication tunnel between the client terminal and the mobile server terminal.

Thus, the access request signal is transmitted between the client terminal and the mobile server terminal via a different type of communication method than the communication session. itself

The Examiner concludes that Liu [20], FIG. 1C discloses a cellular phone, laptop and PDA, which could inherently have SMS and email.

While it is true that a device capable of email or SMS can communicate with another device through an email or SMS method itself, nowhere does Liu teach or even suggest a method by which a direct tunneling communication session can be requested via an SMS or email message within the context of claim 1.

In view of at least the above arguments, Applicant requests that the claim rejections under §102 based on Liu be withdrawn.

III. CLAIM REJECTIONS UNDER 35 USC § 103

Claim 9 is rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Liu as applied to claim 1 above, and further in view of Spaur et al. (US 5,732,074).

Claim 7 is rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Liu as applied to claim 1 above, and further in view of Kelton et al. (US 2004/0125779).

Claim 3 is rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Liu as applied to claim 1 above, and further in view of Spaur and Barry Porozni (WO 2003/0010669).

Claim 6 is rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Liu as applied to claim 1 above, and further in view of Spaur and Kelton.

Claims 5 and 8 are rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Liu as applied to claim 1 above, and further in view of Barry and Chen et al (US 6,842,456).

Claim 12 is rejected under 35 U.S.C. § 103(a) as being allegedly unpatentable over Liu as applied to claim 1 above, and further in view of Spaur and Haugli et al (US 2004/0125776).

The deficiencies of the above, secondary references were discussed in Applicant's prior response, which are incorporated herein.

Applicant further respectfully requests that the claim rejections under §103 be withdrawn for at least the reasons provided in Applicant's prior response.

The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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